

REMARKS/ARGUMENTS

Claims 1-75 are pending. The Office Action mailed May 6, 2008, has been received and its contents carefully considered. Reconsideration and withdrawal of the outstanding rejections are respectfully requested in view of the foregoing amendments and the following remarks.

In the Office Action mailed May 6, 2008, claims 1-73 stand rejected. Claims 74 and 75 are newly added. Applicants have thoroughly reviewed the outstanding Office Action including the Examiner's remarks and the references cited therein. The following remarks are believed to be fully responsive to the Office Action. All the pending claims at issue are believed to be patentable.

Claim 1 is amended in several particulars for purposes of clarity in accordance with current Office policy, to assist the examiner and to expedite compact prosecution of this application.

The telephonic interview conducted between Examiner J. Ochoa and S. Sahota (Reg. 47,051) on March 3, 2008, discussing the reference of U.S. Patent 6,113,644 by Weber et al. was considered by the Examiner, but is now moot because of the new rejections made by the Examiner on May 6, 2008.

As to claim 70 and in previously amended claims 1, 18, 27, 35, 44, 52 and 61, according to 35USC112, sixth paragraph, means for function language is recited in the claims.

As to claim 10, with regard to the claim language "fully automating", clarification of the support is shown in, for example, the following specification sections. In paragraph 22, it states, "An embodiment in accordance with the present invention provides a Knowledge Based Interior Development tool that enhances and automates the process for developing

interior configurations.” Additionally, in paragraph 23, the specification states that “The Knowledge Based Interior Development tool enables the users to easily and efficiently access and share geometry and parameter data for the development of interior designs while consistently checking and assuring compliance with certification regulations.” Furthermore, in paragraph 38 the specification states, “Because all of the components are inter-related through zones and awareness of boundaries, the update is completed automatically. Following the example above, if the configurator reduces the recline distance of the seats in the last row by one inch, enough space may be freed up behind that row to insert another row of seats. The system knows this because the code is programmed to insert rows of seats behind other rows of seats if another monument (or the aft bulkhead) is not in the way. Thus, by changing the attributes of one row of seats, another row of seats is added automatically.” Additionally, in paragraph 47, the specification states, “Because of the automated nature of the system, updates can be concluded in a much shorter amount of time than was previously possible. This allows for live configuration during a demonstration to a customer, which was impractical with longer configuration times.”

Therefore, the specification shows that the arranging of the interior section of vehicle and checking of clearances and certifications are automatically done without manual input, such as impractical long configuration times, thereby being fully automatic.

CLAIM REJECTION – 35 U.S.C. § 103(a)

According to MPEP 706.02(j), the following establishes a *prima facie* case of obviousness under 35 U.S.C. §103:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the

art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

A. Claims 10-15 are rejected under 35 U.S.C. 103(a) as being unpatentable over Noma et al. (Noma hereinafter), Pre-Grant publication 20040010398 (see PTO-892 Notice of Reference Cited dated 3/12/07) taken in view of Lohmann et al., (Lohmann hereinafter), Pre-Grant publication 20020026296 (see PTO-892 Notice of Reference Cited dated 3/12/07). The Applicant respectfully traverses.

As to claim 10, the Examiner states that Noma fails to disclose fully automating the arranging of interior objects while checking clearances and certification requirements for the entire interior whenever a change is made, but that Lohmann discloses a method further comprising of fully automating the arranging of interior objects while checking clearances and certification requirements for the entire interior whenever a change is made (see paragraph [0032]).

Paragraph 32 states, "automatically configure component arrangements, i.e. to automatically define the spatial arrangement of structural components relative to each other, and the optimization thereof with respect to their functional positions (for example the visibility and/or reachability of components that must be accessed by passengers) and/or with respect to regulations and other requirements limiting the allowable arrangements, and/or with respect to the quantity or number of the components.", but it does not state that it is fully

automated. The specification of Lohman states that configuration is automated, but it does not teach or suggest that the entire interior is affected as in the present claimed invention. Lohman fails to take into account and is not capable of processing the variables of all the interior changes as seen in the present invention, but rather only looks at certain ones.

As to claim 11, the Examiner states that Noma discloses a method wherein said digital definition comprises a plurality of data objects representing different aspects of the interior/configurable space (see paragraphs [0092]-[0094] and [0203]), an object placing sequence including every object in the system having a zone that defines the boundaries within which it can be placed, accommodating full automation.

However, every object of Noma does not have the zone and it does not accommodate full automation by defining all of the objects involved. Noma only deals with certain limited variable, but never actually teaches of taking into account of all the variables of the zones in the interior.

B. Claims 1-7, 27-32, 35-41, 44-49, 52-58, 61-66, and 69-73 are rejected under 35 U.S.C. 103(a) as being unpatentable over Noma taken in view of Lohmann as applied to claim 10 above, and further in view of Weber et al., (Weber hereinafter), U.S. Patent 6,113,644 (see PTO-892 Notice of Reference Cited dated 3/12/07). The Applicant respectfully traverses.

As to claim 1, the Examiner admits that Noma fails to disclose determining automatically whether a second change to the interior section of the passenger vehicle is necessary because of the first change to the interior section of the passenger vehicle and execute automatically the second change to the interior section of the passenger vehicle by updating said digital definition, but that Lohmann discloses determining automatically

whether a second change to the interior section of the passenger vehicle is necessary because of the first change to the interior section of the passenger vehicle and execute automatically the second change to the interior section of the passenger vehicle by updating said digital definition (see paragraph [0032]).

However, as noted above, Lohman does not teach the automation of all the interior variable involved, but rather only a select portion and the changes are taken into account serially, rather than as a whole affecting the entire interior.

The Examiner admits that the Noma-Lohmann system lacks zones being arranged in a hierarchy wherein each zone represents a smaller portion of the vehicle, and there is at least one or more smaller zones inside a larger zone, but that Weber discloses a system further comprising of a means for zones being arranged in a hierarchy wherein each zone represents a smaller portion of the vehicle, and there is at least one or more smaller zones inside a larger zone (see col. 6, lines 10-21).

However, Weber states, "Occupant reach may be determined in many ways, for example generating reach geometries, including distances, surfaces, and zones." Additionally, further in col., 6 on lines 51-56, Weber states "The surfaces so displayed form reach zones such that vehicle system controls, such as buttons, which are occupant accessible appear in an accessibility zone on an occupant side of the surface, while those controls which are inaccessible appear in an inaccessibility zone on an instrument panel side of the surface." However, clearly the zone of Weber are not as claimed in terms of zone being arranged in a hierarchy, where each zone represents a smaller portion of the vehicle. Hierarchy of the zones are never mentioned in Weber.

As to claims 27, 35, 44, 52, 61, the remarks with regard to the automation and zones are shown above. Unlike the references cited, the present invention can fully automate the changes to all the interior parts at the same time. The zones used in the invention aids in the increased efficient processing of the present invention as compared to the cited references.

As to claim 45, the Examiner states that Noma discloses a method wherein said digital definition comprises a plurality of data objects representing different aspects of the interior/configurable space (see paragraphs [0092]-[0094] and [0203]), an object placing sequence including every object in the system having a zone that defines the boundaries within which it can be placed, accommodating full automation. 38.

However, Noma does not teach the zones as claimed, and neither does Weber as shown above. Also Weber does not teach that *every* object in the system having a zone accommodates full automation.

CONCLUSION

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. If it is believed that the application is not in condition for allowance, the Examiner is requested to contact the undersigned attorney if it is believed that such contact will expedite the prosecution of the application.

In the event this paper is not timely filed, Applicant petitions for an appropriate extension of time. Please charge any fee deficiencies or credit any overpayments to Deposit Account No. 50-2036 with reference to Attorney Docket No. 5165.1400.

Respectfully submitted,

BAKER & HOSTETLER LLP



S. Sahota
Reg. No. 47, 051

Date: August 6, 2008
Washington Square, Suite 1100
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5304
Telephone: 202-861-1744
Facsimile: 202-861-1783